

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

In re:

Chapter 11

Hiawatha Manor Association, Inc.,

Case No. 25-01916

Debtor.

Judge Randal S. Mashburn

EXHIBIT INDEX

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Filed by Linda Simmons, pro se

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EXHIBIT B

Email Exchange with Debtor's Counsel Regarding Discovery Coordination

June 24, 2025 – July 1, 2025



Linda Simmons <lindasimmons2866@gmail.com>

RE: Scheduling Rule 26(f) Discovery-Planning Conference (Adv. Proc. No. 25-90051)

1 message

Blake.Roth@hklaw.com <Blake.Roth@hklaw.com> Tue, Jul 1, 2025 at 10:32 AM
To: Linda Simmons <lindasimmons2866@gmail.com>
Cc: "Yielding, Rebecca J. (USTP)" <rebecca.j.yielding@usdoj.gov>, "Blake.Roth@hklaw.com" <Blake.Roth@hklaw.com>, "Scott.Kunde@hklaw.com" <Scott.Kunde@hklaw.com>

Ms. Simmons,

Good afternoon. You are but one of thousands of potential defendants that would want to participate in such a conference. Accordingly, we believe it premature to schedule at this time.

Blake Roth | Holland & Knight
Partner
Holland & Knight LLP
511 Union Street, Suite 2700 | Nashville, Tennessee 37219
Phone 615.850.8749 | Fax 615.244.6804
blake.roth@hklaw.com | www.hklaw.com

[Add to address book](#) | [View professional biography](#)

From: Linda Simmons <lindasimmons2866@gmail.com>
Sent: Tuesday, July 1, 2025 11:12 AM
To: Roth, Blake (NSH - X68749) <Blake.Roth@hklaw.com>
Cc: Yielding, Rebecca J. (USTP) <rebecca.j.yielding@usdoj.gov>
Subject: Re: Scheduling Rule 26(f) Discovery-Planning Conference (Adv. Proc. No. 25-90051)

[External email]

Mr. Roth,

I'd like to schedule our Rule 26(f) discovery-planning conference for the week following the July 8 hearing. Could you let me know if any of these 60-minute slots fits your calendar?

- Tuesday, July 15, 3:00-4:00 p.m. CDT
- Wednesday, July 16, 2:00-3:00 p.m. CDT
- Thursday, July 17, 1:00-2:00 p.m. CDT

If none of those work, please suggest a few alternatives.

lindasimmons2866@gmail.com

On Mon, Jun 30, 2025 at 3:53 PM Blake.Roth@hklaw.com <Blake.Roth@hklaw.com> wrote:

The rules do not permit you to specify a date for responses. The rules set forth the responses. I would also note that discovery is prohibited in the adversary proceeding until after the Rule 26(f) conference. Any requests for the production of documents served prior to that date are deemed served at the first Rule 26(f) conference. Accordingly, any response would be due 30 days thereafter.

Blake Roth | Holland & Knight

Partner

Holland & Knight LLP

511 Union Street, Suite 2700 | Nashville, Tennessee 37219

Phone 615.850.8749 | Fax 615.244.6804

blake.roth@hklaw.com | www.hklaw.com

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From: Linda Simmons <lindasimmons2866@gmail.com>

Sent: Monday, June 30, 2025 4:47 PM

To: Roth, Blake (NSH - X68749) <Blake.Roth@hklaw.com>

Subject: Re: First Request for Production of Documents by Linda Simmons – In re Hiawatha Manor East Chapter 11

[External email]

Good afternoon Mr. Roth,

Thank you for pointing that out. The Requests for Product were served in connection with Hiawatha Manor Association, Inc, Plaintiff v. Charles H. Abernathy, et. al., Defendants, Adversary Proceeding No. 25-90051 (in which I am one of the Defendants.) My apologies for the omission of the adversary caption and docket number.

I'll send an Amended RFP tomorrow with the correction caption and number. In that amendment, I'll propose that responses be due 21 days after service; please let me know if you'd like a different turnaround.

And thank you for the clarification on the September 3rd date.

lindasimmons2866@gmail.com

Linda Simmons

Case 2:25-bk-01916 Doc 63-2 Filed 07/29/25 Entered 07/29/25 15:11:30 Desc

EXHIBIT C

Lemonjuice Mailing to Co-Owners

May 20, 2025

(Excerpt: Cover Page Only)

Excerpted for Relevance. Full enclosures are listed on this cover page and are documents separately on file with the Court as part of the bankruptcy and adversary proceeding docket.

May 20, 2025

Re: Information about the Hiawatha East Bankruptcy Case

Dear Hiawatha East Interval Owner,

As many of you know, Hiawatha Manor Association (East) (“**Hiawatha East**”) has filed for bankruptcy. You are receiving this notice because county land records show you may still have an ownership interest – or some remaining responsibility – for a timeshare at Hiawatha East.

Why Hiawatha East filed Chapter 11

On May 6, 2025, Hiawatha East began Chapter 11 Case No. 25-01916 to arrange a single, court-supervised sale of the entire resort, free and clear of all timeshare interests. After the sale closes, the net proceeds will be distributed to current interval owners, minus any unpaid amounts each owner owes the HOA.

What to do on your end

- **No action is required on your end.**
- At the end of the proceeding, a settlement distribution agent might ask you for a 1099 or other information if funds from the sale of this property are due you.
- If you are not a US resident, we will be reaching out for more details to ensure everything goes smoothly on your end. Please email HiawathaEastReimagined@Lemonjuice.biz to update your telephone and address information.

A creditors’ meeting (“§ 341”) will be held June 3, 2025, at 1:30 p.m. Central by telephone (see bankruptcy notice). Most owners are not creditors, but we are required to inform

Enclosures

1. Official Form 309F1 – basic bankruptcy notice and § 341 details
2. Summons & Notice of Pre-Trial Conference (East)
3. Complaint – Hiawatha East.

All court filings, meeting minutes, sale updates, and answers to common questions will be posted at <https://hiawatha-east.info>.

Questions? Email HiawathaEastReimagined@Lemonjuice.biz or scan the QR code below:

Sincerely,

Lemonjuice – Hiawatha East Management

7380 W. Sand Lake Rd., Suite 130
Orlando, FL 32819



EXHIBIT C-2

**Excerpt from Zoom Meeting Recording
Discouragement of Owner Participation
April 9, 2025**

The following excerpt is from the April 9, 2025 Zoom meeting:

(23:15) DR. BOB: Now everyone that delays this process, or throws a wrench into the works, is costing us money. It is less money for the owners, and it just delays the whole process. And we'd like to get everyone who has maintained their maintenance fees as much money as they can. But anyone who delays the process, it's just going to cost us more money at this point.

(30:15) MR. INGRAM: All that being said, the judge looks at the complaints. And the complaints – I've never had a single property that didn't have at least one owner complaint. And I've never had a single property that – and it's usually one or two that makes a complaint. And I get on the phone and explain to them—this is what happened. This is why.

We try to do that in advance. No different than in these town halls today. We do that in advance. And then it's not that if one person complains, the judge doesn't proceed. It's it slows down the process, just like Dr. Bob was referencing.

The outcome is there's – every day is a cash register ringing on expenses without equal income coming in. The more efficient we are in the process between here and the day that we get it sold – and by the way, we don't know much it's sold— We believe the property . . .

EXHIBIT D

Email from Debtor's Counsel in Response to Request for Plan Protections

July 14, 2025

(Includes Movant's letter and counsel's reply.)



Linda Simmons <lindasimmons2866@gmail.com>

RE: Request for Plan Language – Hiawatha Manor Association, Inc. (Case No. 25-01916)

1 message

Blake.Roth@hklaw.com <Blake.Roth@hklaw.com>
To: Linda Simmons <lindasimmons2866@gmail.com>
Cc: "Blake.Roth@hklaw.com" <Blake.Roth@hklaw.com>

Mon, Jul 14, 2025 at 1:19 PM

Ms. Simmons,

Good afternoon. Thank you for your letter and concern. When a plan is drafted, we'll make sure to take your concerns into account. It would, however, be inappropriate for us to commit to any particular language in any plan at this stage in the case.

Blake Roth | Holland & Knight

Partner

Holland & Knight LLP

511 Union Street, Suite 2700 | Nashville, Tennessee 37219

Phone 615.850.8749 | Fax 615.244.6804

blake.roth@hklaw.com | www.hklaw.com

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Linda Simmons <lindasimmons2866@gmail.com>

Request for Plan Language – Hiawatha Manor Association, Inc. (Case No. 25-01916)

1 message

Linda Simmons <lindasimmons2866@gmail.com>

Mon, Jul 14, 2025 at 12:50 PM

To: Blake.Roth@hkllaw.com

Cc: "Jack Robinson, Jr." <jrobinsonjr@gsrcm.com>, "tforrester@gsrcm.com" <tforrester@gsrcm.com>, djames@gsrcm.com

Mr. Roth:

Please find attached my letter requesting that the Debtor propose Plan language to protect non-delinquent owners in the above-referenced case.

Regards,

Linda Simmons

(615) 594-2866

lindasimmons2866@gmail.com



Simmons_Letter_to_Roth_RE_Plan_Language_for_Paid_Owners_7-14-2025.pdf

118K

Linda Simmons
9643 Chanteclair Circle
Highlands Ranch, CO 80126

July 14, 2025

Mr. Blake Roth
Holland & Knight LLP
511 Union Street, Suite 2700
Nashville, Tennessee 37219

RE: In re Hiawatha Manor Association, Inc., Case No. 25-01916
Subject: Request for Plan Language Protecting Non-Delinquent Timeshare Owners from
Post-Confirmation Liability

Dear Mr. Roth:

I am writing to request that the forthcoming Chapter 11 Plan of Liquidation for Hiawatha Manor Association, Inc. include clear language protecting the interests of those owners who are current on their maintenance assessments as of the Plan's effective date.

Without clarity in the Plan, there remains a risk, even if unintended, that owners who have paid their assessments in full may later face claims relating to unresolved Association debts or administrative costs not fully satisfied during the bankruptcy process.

This concern is especially pressing in light of the current process under which owners are asked to pay a \$250 fee to deed back their week. I understand the Debtor may contend that owners wishing to avoid future obligations should participate in the deed-back program. However, requiring owners to pay a \$250 fee to forfeit a fully paid-up interest under threat of future claims, imposes a coercive burden that is neither required by the recorded declarations nor authorized by any existing court order. If the Plan does not confirm that retaining fully paid ownership will not result in continuing liability for bankruptcy-related shortfall, there remains a real risk that such owners could later be targeted for contribution or collection efforts by a successor entity.

If the Plan intends to treat Lemonjuice's claims as enforceable against non-delinquent owners, this must be stated expressly and is likely to raise legal objections under § 524 of the Bankruptcy Code and related protections. Owners should not be forced into private forfeiture as the only means of avoiding undefined future liabilities. Such a requirement may also violate fundamental

principles of due process and unjust enrichment, particularly where owners have fulfilled all contractual obligations under the original governing documents.

I urge that this matter be addressed expressly in the Plan to provide clarity and protect owners who have acted in good faith to meet their obligations, in many cases by faithfully paying maintenance fees for more than 40 years.

I request a written response confirming whether such protective language will be included in the proposed Plan. If so, I ask that the Debtor provide the specific language in advance, so that any issues may be addressed now to avoid last-minute objections or delays.

Respectfully,

Linda Simmons
Co-Owner, Hiawatha Manor Association East
lindasimmons2866@gmail.com
615-594-2866

Cc: Rebecca J. Yielding, U.S. Trustee (Rebecca.J.Yielding@usdoj.gov)
Jack W. Robinson, Jr., Counsel for Lake Tansi Village, POA (jrobinsonjr@gsrcm.com)

EXHIBIT E

**Letter from Hiawatha East President Archie Doby
Including Q&A Stating Former Owners Will Have No Further Obligations
December 17, 2024**

HIAWATHA EAST RESORT

December 17, 2024

Subject: Important Update Regarding Hiawatha Resort

Dear Hiawatha East Owners,

I hope this message finds you well. I am reaching out to share an important update regarding the financial status of Hiawatha East Resort.

Over the past several months, significant efforts have been made to address the challenges the resort has been facing. Despite these efforts, **Hiawatha East Resort is now insolvent.** After careful consideration of all available options, the decision has been made to initiate bankruptcy proceedings in the coming weeks.

This step was not taken lightly and is a result of a combination of factors, including rising operational costs, changes in market conditions, and insufficient revenue to sustain the resort's financial obligations. Filing for bankruptcy will provide a structured path forward and ensure that all stakeholders, including owners, are treated equitably during this process.

What This Means for Owners:

1. **Current Operations:** The resort will remain operational during the early stages of the bankruptcy process, and efforts will be made to minimize any disruptions.
2. **Owner Impact:** Details regarding the implications for ownership interests and next steps will be shared as soon as they become available.
3. **Future Communication:** Regular updates will be provided to ensure transparency throughout the process.

We understand that this news may be concerning, and we are committed to providing clear and timely information. If you have immediate questions or concerns, please use the contact us page of the info site <http://hiawatharesort.info/contact-us> or call Lemonjuice Solutions Owner Support at 931-444-1394. If email is convenient, please send an email to hiawathaeastreimagined@lemonjuice.biz.

Thank you for your understanding and support during this challenging time. Hiawatha East Resort has long been a cherished destination, and this decision reflects our commitment to addressing its financial challenges in a responsible and transparent manner.

Sincerely,

Archie Doby, Hiawatha East Board President

HIAWATHA EAST RESORT

Q: Why are we taking this route?

A: The purpose of this bankruptcy is to obtain a federal court order to oversee the sale proceeding and also ensure that everything is carried out adequately regarding the sale of Hiawatha East up to and including distribution of the net proceeds of any sale amount to the current owners.

Q: How will the bankruptcy process affect me as an owner?

A: Bankruptcy is an association-level process aimed at selling the Hiawatha East property to maximize its value for all owners. It will not affect your personal credit.

Q: How long is this process going to take?

A: The entire process can take up to 1 year. The auction will occur after the Court approves the sale of Hiawatha East.

Q: Will I need to appear in Court?

A: You will not be required to appear before the Court. If the Judge approves the sale, you will receive your due share of the sale proceeds at the time of distribution.

Q: What if I am behind on my fees?

A: Any delinquent fees and related expenses owed to Hiawatha East will be deducted from your proceeds after the sale. The remaining funds will be distributed to the owners after all accounts have been settled.

Q: Can I still deed back my week?

A: Yes, you can deed back your week to the Association. We request that all owners that would like to deed back are current on maintenance fees and pay a \$250 filing fee. You can email HiawathaEastReimagined@Lemonjuice.biz with any questions regarding deeding back.

Q: Do I continue to pay Maintenance and Taxes?

A: Hiawatha East is not currently collecting 2025 maintenance fees and, as a result, will not be making reservations for 2025 or allowing deposits into exchange companies for 2025 intervals at this time. If you currently have a deposit with an exchange company, there is no impact to your deposit. For RCI Points members, RCI points for your current use year should be available with no disruption.

HIAWATHA EAST RESORT

Q: After the bankruptcy has been completed, and the property sold, will the former owners have any repercussions since they were named owners of the resort?

A: Once the bankruptcy process has been completed and the property has been sold, former owners will not have any further obligations or repercussions related to their prior ownership of the resort. The sale of the property and conclusion of the bankruptcy proceedings will release former owners from any ongoing liabilities or responsibilities associated with the resort.

EXHIBIT F

Email from Kate Koeppen Regarding Owner Liability and Deed-Backs

March 10, 2025

3. If a deed back is applied for after the bankruptcy is filed, will that have to be approved by the bankruptcy court? Or would that be considered an action that LemonJuice could take as a normal course of business? **No. We are allowed to proceed.**

4. What could happen within the bankruptcy proceedings that would put an end to the option for owners to do a deed back? **There is nothing preventing an owner from deeding back and I've been told there's no line in the sand where we have to stop accepting deed backs.**

5. Have you received any opinion from Holland & Knight that a Chapter 9 reorganization bankruptcy will 100% result in a discharge of any deficiencies? Or is there any possibility, however, small, that that may not take place? **We are filing Chapter 11, not Chapter 9. As stated in prior calls, the bankruptcy discharges deficiencies, and in the event that it could not discharge certain creditors, the court requirement is sale of the property. This is already the end goal. The owners are not responsible for any deficiencies, only the Association is responsible.**

EXHIBIT G

**Excerpt from Zoom Meeting Recording
Assurance That No Liability Will Remain After Distribution
February 24, 2025**

The following exchange occurred during the February 24, 2025 Zoom meeting. The speaker was not identified by name in the recording:

(28:22) SPEAKER: So if I didn't deed back and I just held on and see what happens with the distribution, then once that's done, I'm free of the timeshare? Is that what I'm hearing?

MS. KOEPPEN: Yes, that's correct. Once you receive distribution proceeds, you are done. You are no longer an owner of the timeshare.

SPEAKER: And I'm not liable for any other expenses that might occur?

Ms. KOEPPEN: That's correct.

SPEAKER: Court costs or anything like that?

MS. KOEPPEN: That's correct.

SPEAKER: Okay. Well, thank you for your answers.

EXHIBIT H

**Excerpt from Zoom Meeting Recording
Statement Regarding 476-Week Transfer to Lemonjuice
February 24, 2025**

The following statement was made during a February 24, 2025 Zoom meeting:

(30:33) MS. KOEPPEN: So those weeks are part of a purchase agreement executed between the Association and Lemonjuice. Lemonjuice has loaned Hiawatha East Association approximately \$300,000. And in exchange for that \$300,000, we took the right to purchase receivables or to purchase intervals. And so those intervals are part of that purchase agreement deal.

Now, there's 120,000 extra funds that the association can pull on as they need to, and with that comes the option to exercise more weeks.

EXHIBIT I

**Deeds Reflecting Transfer of Timeshare Intervals
From Hiawatha Manor Association, Inc. to Lemonjuice Capital Solutions, LLC
February – March 2025**

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Instrument Type	Book & Page/Filing #	Recording Date & Time	Instrument #
QUITCLAIM DEED	1701-826	7/29/2024 10:29:00 AM	24023070
Document Date	Consideration Amount	Index Class	Recording Class
7/3/2024	\$1.00	Land Records	
			Record Book

Direct Parties		Reverse Parties	
Name	WHO	Name	WHO
CROWN RESORTS DEVELOPMENT LLC		HIAWATHA MANOR ASSOCIATION INCORPORATED	

Property Information							
Subdivision / Property Address	Section	Phase	Lot	Building	Unit	Acres	District
HIAWATHA MANOR	1						3

Comments
WK 1 UNS K-3, K-4, L-7 & N-1 HIAWATHA MANOR 1 * WK 1 UNS N-4, N-6, O-2 & P-4 HIAWATHA MANOR

Linked Documents				
Recording Class	Book & Page/Filing #	Description	Recording Date & Time	Instrument Number
RB	1567-1776	QUITCLAIM DEED	1/15/2020 10:55:00 AM	20000494
D	231-215	DEEDCONV	10/28/1980	80035110
D	231-215	DEEDCONV	10/28/1980	80035110
RB	1716-2418	QUITCLAIM DEED	2/26/2025 9:40:00 AM	25031339
RB	1719-762	QUITCLAIM DEED	3/28/2025 1:52:00 PM	25032614

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Instrument Type	Book & Page/Filing #	Recording Date & Time	Instrument #
QUITCLAIM DEED	1716-2418	2/26/2025 9:40:00 AM	25031339
Document Date	Consideration Amount	Index Class	Recording Class
2/24/2025	\$0.00	Land Records	Record Book

Direct Parties		Reverse Parties	
Name	WHO	Name	WHO
HIAWATHA MANOR ASSOCIATION INCORPORATED		LEMON JUICE CAPITAL LLC	
		LEMONJUICE CAPITAL LLC *	

Property Information							
Subdivision / Property Address	Section	Phase	Lot	Building	Unit	Acres	District
HIAWATHA MANOR	I						3

Comments	Legal Description

Linked Documents				
Recording Class	Book & Page/Filing #	Description	Recording Date & Time	Instrument Number
RB	1701-826	QUITCLAIM DEED	7/29/2024 10:29:00 AM	24023070
RB	1715-1483	QUITCLAIM DEED	2/5/2025 10:26:00 AM	25030621
RB	1694-2184	DEED	4/29/2024 10:05:00 AM	24019531
RB	1697-624	DEED	6/3/2024 12:10:00 PM	24020838
RB	1694-2182	DEED	4/29/2024 10:05:00 AM	24019530
RB	1697-636	DEED	6/3/2024 12:10:00 PM	24020844
RB	1591-121	TRUSTEES DEED	10/27/2020 11:23:00 AM	20013296
RB	1692-1636	DEED	3/25/2024 12:45:00 PM	24018194
RB	1697-634	DEED	6/3/2024 12:10:00 PM	24020843
RB	1696-617	DEED	5/20/2024 12:45:00 PM	24020268
RB	1697-660	DEED	6/3/2024 12:10:00 PM	24020856
RB	1697-658	DEED	6/3/2024 12:10:00 PM	24020855
RB	1529-901	TRUSTEES DEED	6/28/2018 10:29:00 AM	18007692
RB	1694-2190	DEED	4/29/2024 10:05:00 AM	24019534
RB	1203-2004	DEED	7/26/2005 2:00:00 PM	5341183
RB	1697-646	DEED	6/3/2024 12:10:00 PM	24020849
RB	1697-628	DEED	6/3/2024 12:10:00 PM	24020840
D	231-215	DEEDCONV	10/28/1980	80035110
D	231-215	DEEDCONV	10/28/1980	80035110

Cumberland County Tennessee

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Instrument Type	Book & Page/Filing #	Recording Date & Time	Instrument #
QUITCLAIM DEED	1716-2432	2/26/2025 10:41:00 AM	25031341
Document Date	Consideration Amount	Index Class	Recording Class
2/24/2025	\$0.00	Land Records	Record Book

Direct Parties		Reverse Parties	
Name	WHO	Name	WHO
HIAWATHA MANOR ASSOCIATION INCORPORATED		LEMON JUICE CAPITAL LLC	
		LEMONJUICE CAPITAL LLC *	

Property Information							
Subdivision / Property Address	Section	Phase	Lot	Building	Unit	Acres	District
HIAWATHA MANOR							3

Comments	Legal Description

Linked Documents				
Recording Class	Book & Page/Filing #	Description	Recording Date & Time	Instrument Number
RB	1701-816	QUITCLAIM DEED	7/29/2024 10:29:00 AM	24023069
RB	1715-1374	QUITCLAIM DEED	2/4/2025 2:11:00 PM	25030598
RB	1540-180	DEED	12/6/2018 11:55:00 AM	18014275
RB	1656-283	DEED	9/26/2022 10:35:00 AM	22015062
RB	1591-116	TRUSTEES DEED	10/27/2020 11:23:00 AM	20013295
RB	1529-901	TRUSTEES DEED	6/28/2018 10:29:00 AM	18007692
RB	1455-1958	TRUSTEES DEED	7/22/2015 10:37:00 AM	15008193
RB	1203-2004	DEED	7/26/2005 2:00:00 PM	5341183
RB	1656-1763	QUITCLAIM DEED	10/3/2022 10:47:00 AM	22015447
RB	1697-656	DEED	6/3/2024 12:10:00 PM	24020854
RB	1125-1431	DEED	1/13/2003 11:30:00 AM	3286777
RB	1130-562	DEED	3/10/2003 3:36:00 PM	3290041
RB	1696-611	DEED	5/20/2024 12:45:00 PM	24020265
RB	1478-453	TRUSTEES DEED	6/28/2016 10:38:00 AM	16007344
RB	1534-2153	DEED	9/14/2018 10:10:00 AM	18011098
RB	1588-775	DEED	9/28/2020 12:40:00 PM	20011858
RB	1537-577	DEED	10/22/2018 11:37:00 AM	18012573
D	216-209	DEEDCONV	8/28/1979	79022602
D	216-209	DEEDCONV	8/28/1979	79022602

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Instrument Type	Book & Page/Filing #	Recording Date & Time	Instrument #
QUITCLAIM DEED	1719-762	3/28/2025 1:52:00 PM	25032614
Document Date	Consideration Amount	Index Class	Recording Class
3/28/2025	\$0.00	Land Records	Record Book

Direct Parties		Reverse Parties	
Name	WHO	Name	WHO
HIAWATHA MANOR ASSOCIATION INCORPORATED		LEMON JUICE CAPITAL LLC	
		LEMONJUICE CAPITAL LLC *	

Property Information							
Subdivision / Property Address	Section	Phase	Lot	Building	Unit	Acres	District
HIAWATHA MANOR	I						3

Comments	Legal Description

Linked Documents				
Recording Class	Book & Page/Filing #	Description	Recording Date & Time	Instrument Number
RB	1715-1483	QUITCLAIM DEED	2/5/2025 10:26:00 AM	25030621
RB	1701-826	QUITCLAIM DEED	7/29/2024 10:29:00 AM	24023070
RB	1697-648	DEED	6/3/2024 12:10:00 PM	24020850
RB	1696-609	DEED	5/20/2024 12:45:00 PM	24020264
RB	1696-607	DEED	5/20/2024 12:45:00 PM	24020263

Cumberland County Tennessee

EXHIBIT J

Excerpt from Zoom Meeting Recording

Owner Question and Response Regarding Suspension of 2025 Maintenance Fees

August 1, 2024

The following excerpt is from the August 1, 2024 Zoom meeting:

(1:03:44) MS. COSTELLO: Excuse me, I have another question. This is Susan Costello. I have another question.

When we met earlier this year, with LemonJuice, we were told, the owners were told, this would be the last year that we would be paying our maintenance fee. And everyone was encouraged to pay the maintenance fee.

Is that true? Will there be maintenance fee for next year also?

MS. KOEPPEN: I will hopefully have more answers for you on that in the coming weeks. It depends on if we do have to go the bankruptcy route, and how long that path takes.

MS. COSTELLO: Okay.

MS. KOEPPEN: So I don't want to say yes or no on that yet until I have more information for you on that.

EXHIBIT K

**List of Quitclaim Deed Transfers of Timeshare Intervals
to Debtor Hiawatha Manor Association East
January 1, 2025 – May 5, 2025 (Pre-Petition)**

Search Time = 0 minute(s), 0 second(s)
84 records found

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Item	Grant[OR] / Grant[EE]	Other Party	Instr. Type	Date	Class	Blk-Pg/Filed
1	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	HUX PAMELA ASBURY TRUSTEE	QC	5/1/2025	RB	1722-297
2	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	STREB ROBERT *	QC	4/29/2025	RB	1721-2249
3	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	DEAN THOMAS M. *	QC	4/23/2025	RB	1721-1245
4	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	WEISS ERIC S. *	QC	4/23/2025	RB	1721-1159
5	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	PHILLIPS LUCILLE A. *	QC	4/23/2025	RB	1721-1095
6	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	DELF MICHAEL *	QC	4/17/2025	RB	1721-104
7	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	DELF MICHAEL *	QC	4/17/2025	RB	1721-100
8	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	PHILLIPS BRADLEY T. *	QC	4/16/2025	RB	1720-2378
9	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	J MAYS INVESTMENTS LLC	QC	4/14/2025	RB	1720-1469
10	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	WALK MICHAEL L.	QC	4/11/2025	RB	1720-1252
11	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	CRESWELL SANDRA L. *	QC	4/11/2025	RB	1720-1248
12	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	DEBUSK MARIE S.	QC	4/10/2025	RB	1720-1144
13	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	DEBUSK MARIE M. *	QC	4/10/2025	RB	1720-1140
14	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	KESIK CONNIE E. *	QC	4/8/2025	RB	1720-665
15	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	ERNST JAMES C. *	QC	4/8/2025	RB	1720-638
16	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	COUEY RONALD A. *	QC	4/8/2025	RB	1720-632
17	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	CASSETTY CHARLES H. *	QC	4/8/2025	RB	1720-570
18	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	ERNST JAMES C. *	QC	4/4/2025	RB	1719-2455
19	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BLANE HENRY KEVIN *	QC	4/4/2025	RB	1719-2451
20	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	PURCELL JAMES G. JR.	QC	4/4/2025	RB	1719-2445
21	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	MAHAN ROSS P. *	QC	4/4/2025	RB	1719-2441
22	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	ERNST JAMES C. *	QC	4/4/2025	RB	1719-2437
23	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	PUFFENBERGER MARTIN L. *	QC	4/4/2025	RB	1719-2236
24	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BRENT HORACE BILL JR. *	QC	4/4/2025	RB	1719-2240
25	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	TERRELL CLIFTON S. JR. *	QC	4/4/2025	RB	1719-2226

1 2 3 4 next

Item	Grant(OR) / Grant(EE)	Other Party	Instr. Type	Date	Class	Blk. Pg. File #
26	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	PERINI DIANE *	QC	4/4/2025	RB	1719-2222
27	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	PUFFENBERGER MARTIN L. *	QC	4/4/2025	RB	1719-2199
28	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BOYD JAMES E. ETUX	QC	4/4/2025	RB	1719-2195
29	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BATTLES WILLIAM J. *	QC	4/4/2025	RB	1719-2191
30	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	HAYES SIDNEY A. ETVIR	QC	4/4/2025	RB	1719-2187
31	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	PAYNE BEVERLY *	QC	4/2/2025	RB	1719-1713
32	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	HORNE DAVID LEWIS ETUX	QC	4/1/2025	RB	1719-1321
33	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	KENWORTHY GREG *	QC	4/1/2025	RB	1719-1317
34	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	GREENE IMOGENE J. *	QC	4/1/2025	RB	1719-1255
35	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	DORAN JAMES A. *	QC	4/1/2025	RB	1719-1199
36	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	SKELTON HENRY R. ETUX	QC	4/1/2025	RB	1719-1195
37	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	GLADDEN WILLIAM H. *	QC	4/1/2025	RB	1719-1187
38	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	PATE WOLFRED A. JR. *	QC	4/1/2025	RB	1719-1183
39	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	MCLEMORE TOMMY W. *	QC	4/1/2025	RB	1719-1191
40	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	HALLMAN PAUL D. SR. *	QC	4/1/2025	RB	1719-1179
41	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	SCOTT PETER *	QC	4/1/2025	RB	1719-1147
42	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	TODD STEPHEN E. *	QC	4/1/2025	RB	1719-1134
43	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	DAVIS ABIGAIL ELLEN	QC	4/1/2025	RB	1719-1130
44	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	CASADA STEVEN MICHAEL	QC	3/31/2025	RB	1719-1067
45	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	GULLEY MARVIN ALAN	QC	3/28/2025	RB	1719-758
46	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	ROBINSON MINNIE	QC	3/26/2025	RB	1718-2488
47	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	VAUGHAN BILLY L. *	QC	3/25/2025	RB	1718-2241
48	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	REHM JOSEPH III *	QC	3/21/2025	RB	1718-1873
49	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	EVANS REX	QC	3/21/2025	RB	1718-1863
50	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	TIMESHARE SAVINGS LLC *	QC	3/13/2025	RB	1718-285

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Item	Grant(OR) / Grant(EI)	Other Party	Instr. Type	Date	Class	Blk-Pg-File#
51	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	TRIPZILLA LLC	QC	3/12/2025	RB	1717-2256
52	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	PHILLIPS BRADLEY T. *	QC	3/11/2025	RB	1717-2248
53	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	LIFT PUTTERS LLC	QC	3/7/2025	RB	1717-1641
54	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	C AND S RESORT GETAWAY LLC	QC	3/7/2025	RB	1717-1625
55	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	CUMMINGS FAMILY TRUST LLC	QC	3/7/2025	RB	1717-1629
56	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BLUE WATER VACATIONS LLC	QC	3/7/2025	RB	1717-1637
57	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	JBM LAND TRUST LLC	QC	3/7/2025	RB	1717-1633
58	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	HSA LLC	QC	3/7/2025	RB	1717-1598
59	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	PETRUS VACATION RENTALS LLC	QC	3/7/2025	RB	1717-1621
60	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	RESORTS ACCESS NETWORK LLC	QC	3/7/2025	RB	1717-1617
61	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	RESORT PROPERTY HOLDINGS LLC	QC	2/28/2025	RB	1717-732
62	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	QUIXOTE STRATEGIES LLC	QC	2/28/2025	RB	1717-717
63	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	RESORTS ACCESS NETWORK LLC	QC	2/28/2025	RB	1717-713
64	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	HOLIDAY TRAVEL & TOURS LLC *	QC	2/28/2025	RB	1717-709
65	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	TTC HOLDINGS LLC	QC	2/28/2025	RB	1717-662
66	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	RESORTS ACCESS NETWORK LLC	QC	2/27/2025	RB	1717-301
67	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	J MAYS INVESTMENTS LLC	QC	2/25/2025	RB	1716-2133
68	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	ZURCHER DERYLL G. *	QC	2/25/2025	RB	1716-2041
69	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BLAIR DEWEY E. ETUX	QC	2/25/2025	RB	1716-2035
70	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	REHM JOSEPH III *	QC	2/25/2025	RB	1716-2005
71	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BRENT HORACE BILL JR *	QC	2/25/2025	RB	1716-1977
72	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BURRELL RICHARD T.	QC	2/25/2025	RB	1716-1961
73	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	CROWN RESORTS DEVELOPMENT LLC	QC	2/5/2025	RB	1715-1483
74	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	CROWN RESORTS DEVELOPMENT LLC	QC	2/4/2025	RB	1715-1374
75	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BURGESS ROYCE E. ETUX	QC	1/29/2025	RB	1715-84

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New Party Name Search

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Item	Grant[OR] / Grant[EE]	Other Party	Instr. Type	Date	Class	Bk-Pg-File#
76	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	RICHARDS ELIZABETH *	QC	1/15/2025	RB	1714-117
77	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	TOMANO DANIEL J. JR. TRUSTEE *	QC	1/15/2025	RB	1714-39
78	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	TOMANO DANIEL J. JR. TRUSTEE *	QC	1/13/2025	RB	1713-1920
79	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BARRY JAMES V.	QC	1/9/2025	RB	1713-1763
80	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	ONTIVEROS CHARLES *	QC	1/9/2025	RB	1713-1755
81	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	KNAPE BEN K. *	QC	1/9/2025	RB	1713-1759
82	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	FURNARI JOSEPH JR. *	QC	1/9/2025	RB	1713-1747
83	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BRYANT DONALD *	QC	1/9/2025	RB	1713-1711
84	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED *	QC	1/8/2025	RB	1713-1456

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EXHIBIT L

**List of Quitclaim Deed Transfers of Timeshare Intervals
to Debtor Hiawatha Manor Association East
May 6, 2025 – July 27, 2025 (Post-Petition)**

Search Time = 0 minute(s), 0 second(s)
89 records found

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Item	Grant[OR] / Grant[EE]	Other Party	Instr. Type	Date	Class	Doc. # / Filed
1	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	CARTER ROBERT	QC	7/25/2025	RB	1728-184
2	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	COLLINS CYNTHIA MARIE	QC	7/25/2025	RB	1728-149
3	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	CHOATE VERONICA OLLIS	QC	7/25/2025	RB	1728-169
4	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	MOON LISA MICHELE	QC	7/24/2025	RB	1727-2802
5	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	GREEN LYDIA J.	QC	7/24/2025	RB	1727-2798
6	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	FOGLE ANDREW VALMORE	QC	7/24/2025	RB	1727-2794
7	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	FOGLE ANDREW VALMORE	QC	7/24/2025	RB	1727-2790
8	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	LOHMAN LARRY R.	QC	7/24/2025	RB	1727-2786
9	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	MORGAN LINDA G.	QC	7/24/2025	RB	1727-2782
10	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	MILLER PATRICIA	QC	7/24/2025	RB	1727-2750
11	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	DAGNAN ELIZABETH ANN	QC	7/23/2025	RB	1727-2668
12	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	ADAMS TONY MICHAEL	QC	7/23/2025	RB	1727-2661
13	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	TILLER REBECCA N.	QC	7/23/2025	RB	1727-2655
14	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	MC MILLION JUDY	QC	7/23/2025	RB	1727-2651
15	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	ADAMS TONY MICHAEL	QC	7/23/2025	RB	1727-2647
16	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	JACKSON ROBERT W.	QC	7/23/2025	RB	1727-2643
17	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	GHAZAL EZRA M.	QC	7/23/2025	RB	1727-2639
18	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	ROBERTS MARY FRANCES	QC	7/23/2025	RB	1727-2635
19	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	CORRELL SHERRI L.	QC	7/23/2025	RB	1727-2610
20	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	WARING LEONARD H. III	QC	7/23/2025	RB	1727-2356
21	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	VILLANTI MICHAEL J.	QC	7/23/2025	RB	1727-2360
22	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	WARING LEONARD H. III	QC	7/23/2025	RB	1727-2368
23	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	MOORE ROSA WRIGHT	QC	7/23/2025	RB	1727-2372
24	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	PIERCE CATHY D.	QC	7/23/2025	RB	1727-2376
25	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BOWERS JANE B. LILLARD FKA	QC	7/23/2025	RB	1727-2429

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Item	Grant(OR) / Grant(EE)	Other Party	Instr. Type	Date	Class	Blk-Pg-File#
26	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	REAMSMA SHERYL KAY	QC	7/22/2025	RB	1727-2351
27	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	TWITCHELL GREGORY	QC	7/22/2025	RB	1727-2347
28	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	THOMPSON JAMES E.	QC	7/22/2025	RB	1727-2343
29	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	FORDHAM AMBER	QC	7/22/2025	RB	1727-2339
30	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	WAGNER MICHAEL	QC	7/22/2025	RB	1727-2283
31	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	DURHAM STEVEN D.	QC	6/30/2025	RB	1726-969
32	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	DAWSON ROBERT W. TRUSTEE	QC	6/30/2025	RB	1726-965
33	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	MICDUSKI JOSEPH W.	QC	6/30/2025	RB	1726-933
34	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	MILBY ROXYE A.	QC	6/30/2025	RB	1726-964
35	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	SPEICH MICHAEL	QC	6/30/2025	RB	1726-660
36	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	MORROW DONNY R.	QC	6/30/2025	RB	1726-629
37	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	CARRINGER BILLY R.	QC	6/30/2025	RB	1726-637
38	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	KUHLMAN COLLEEN M.	QC	6/27/2025	RB	1726-623
39	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	HALL JEAN S.	QC	6/27/2025	RB	1726-566
40	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	TRAIL MELVIN D.	QC	6/27/2025	RB	1726-499
41	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	MARTIN RAY A.	QC	6/27/2025	RB	1726-487
42	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	FOWLER TERESA D.	QC	6/27/2025	RB	1726-226
43	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	FOWLER TERESA	QC	6/27/2025	RB	1726-244
44	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	SAULS JOHN R.	QC	6/27/2025	RB	1726-248
45	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	WILSON ELIZABETH N.	QC	6/27/2025	RB	1726-252
46	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	JONES SUSIE M.	QC	6/27/2025	RB	1726-256
47	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	FUGATE MARTHA GIBSON FKA	QC	6/27/2025	RB	1726-260
48	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	DOSS LORETTA SUE	QC	6/26/2025	RB	1726-78
49	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BROWN TIMOTHY V.	QC	6/26/2025	RB	1726-74
50	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	ARMES REUBEN L.	QC	6/26/2025	RB	1726-70

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Item	Grant(OR) / Grant(E)	Other Party	Instr. Type	Date	Class	Blk. Pg. File #
51	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	HILL MACK Q.	QC	6/26/2025	RB	1726-60
52	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	HAND FRANK J.	QC	6/26/2025	RB	1726-56
53	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	JUNG RICHARD E.	QC	6/26/2025	RB	1726-42
54	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	WARREN VICKY R.	QC	6/26/2025	RB	1726-33
55	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	TREMBLAY DOUGLAS A.	QC	6/26/2025	RB	1725-2995
56	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	CHAPMAN BEN H.	QC	6/25/2025	RB	1725-2905
57	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	RIDDLE LARHONDA JONES	QC	6/25/2025	RB	1725-2899
58	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	RIDDLE LARHONDA JONES	QC	6/25/2025	RB	1725-2895
59	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	WOMBOLD TROY	QC	6/25/2025	RB	1725-2891
60	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BLAKELY JOHN E.	QC	6/25/2025	RB	1725-2887
61	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	MURDOCK MIKE R.	QC	6/25/2025	RB	1725-2883
62	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	LECHNER LARRY EDWARD	QC	6/19/2025	RB	1725-1609
63	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	SEIBER JEAN W. TRUSTEE	QC	6/19/2025	RB	1725-1617
64	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	LECHNER CHARLENE	QC	6/18/2025	RB	1725-1424
65	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	COTTON TERRY M.	QC	6/18/2025	RB	1725-1342
66	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	WATSON CAROL J.	QC	6/18/2025	RB	1725-1348
67	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	LEWIS RONNIE G.	QC	6/13/2025	RB	1725-322
68	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	MYERS ELDON	QC	6/13/2025	RB	1725-314
69	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	RUTHERFORD KIM. R.	QC	6/13/2025	RB	1725-310
70	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	VANEK MARTIN A.	QC	6/13/2025	RB	1725-257
71	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	RODEN MARGARET B.	QC	6/9/2025	RB	1724-2273
72	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	PAYNE DON L.	QC	6/9/2025	RB	1724-2269
73	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	CLAYTON WILLARD	DEED	5/30/2025	RB	1724-383
74	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	GRIMES JOSEPH B.	QC	5/30/2025	RB	1724-379
75	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	HEDDEN DONALD G.	QC	5/29/2025	RB	1724-171

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Item	Grant[OR] / Grant[EE]	Other Party	Instr. Type	Date	Class	Bk-Pg-File#
76	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	BEARD MICHAEL V.	QC	5/29/2025	RB	1724-167
77	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	ELFTMAN DAVID L.	QC	5/28/2025	RB	1723-2937
78	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	MORGAN PHILLIP G.	QC	5/28/2025	RB	1723-2933
79	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	CORK JULIE E.	QC	5/28/2025	RB	1723-2929
80	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	RUSSELL REX	QC	5/28/2025	RB	1723-2925
81	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	HITCHCOCK MICHAEL D. TRUSTEE	QC	5/28/2025	RB	1723-2921
82	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	HACKETT PHILLIP D.	QC	5/28/2025	RB	1723-2913
83	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	NICKEL ROBERT A.	QC	5/27/2025	RB	1723-2715
84	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	NICKEL ROBERT A.	QC	5/27/2025	RB	1723-2605
85	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	CHASTAIN JEREMY	QC	5/23/2025	RB	1723-2460
86	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	HAMILTON THOMAS R.	QC	5/21/2025	RB	1723-1834
87	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	JUSTIS GINGER R. GODFREY	QC	5/15/2025	RB	1723-795
88	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	GABBARD RONALD L.	QC	5/15/2025	RB	1723-791
89	HIAWATHA MANOR ASSOCIATION INCORPORATED [REDACTED]	WILHIDE JAMES A.	QC	5/6/2025	RB	1722-1607

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Cumberland County Tennessee

EXHIBIT M

**List of Quitclaim Deed Transfers of Timeshare Intervals
to Hiawatha Manor West Association Incorporated
January 1, 2025 – July 27, 2025**

Search Time = 0 minute(s), 0 second(s)
43 records found

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Item	Grant[OR] / Grant[EE]	Other Party	Instr. Type	Date	Class	Ok-Pg/F-Ref
1	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	SMITH ROBERT	QC	7/25/2025	RB	1728-173
2	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	HOLT TREVOR J.	QC	7/23/2025	RB	1727-2695
3	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	COOPER STEVEN L.	QC	7/23/2025	RB	1727-2691
4	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	POWELL WILLIAM D.	QC	7/23/2025	RB	1727-2687
5	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	EDWARDS EDDIE D.	QC	7/23/2025	RB	1727-2683
6	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	REED MALVIN S. JR.	QC	7/23/2025	RB	1727-2676
7	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	ROBERTSON-HULL LINDA FAYE AKA	QC	7/23/2025	RB	1727-2384
8	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	FOLEY JAMES C.	QC	7/23/2025	RB	1727-2398
9	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	HOPPER PATRICIA H.	QC	7/23/2025	RB	1727-2364
10	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	COOK JANICE D. AKA	QC	7/22/2025	RB	1727-2325
11	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	REYMANN CHRISTOPHER T.	QC	7/1/2025	RB	1726-1063
12	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	SKEENS EDDIE L.	QC	7/1/2025	RB	1726-1035
13	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	KEMERLY BARBARA A.	QC	7/1/2025	RB	1726-1039
14	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	PROCTOR DOUGLAS SCOT	QC	7/1/2025	RB	1726-1043
15	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	WOOD DEBORAH J.	QC	7/1/2025	RB	1726-1047
16	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	NORVILLE ATKINS W. III	QC	6/30/2025	RB	1726-973
17	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	HARNESS BRUCE E.	QC	6/30/2025	RB	1726-692
18	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	DOYLE JERRY B.	QC	6/30/2025	RB	1726-641
19	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	FOSTER J. T.	QC	6/27/2025	RB	1726-495
20	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	CLARK LISA	QC	6/27/2025	RB	1726-426
21	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	CLARK LISA	QC	6/27/2025	RB	1726-421
22	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	THORNER DAN	QC	6/24/2025	RB	1725-2452
23	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	CROW JAMES W. JR.	QC	6/23/2025	RB	1725-2269
24	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	BARRY JAMES V.	QC	6/18/2025	RB	1725-1416
25	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	BARRY JAMES V.	QC	6/18/2025	RB	1725-1404

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Item	Grant[OR] / Grant[EE]	Other Party	Instr. Type	Date	Class	Bk-Pg-File#
26	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	KIMBLE BONNELIA M.	QC	6/13/2025	RB	1725-287
27	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	FIKE SCOTT T.	QC	6/9/2025	RB	1724-2286
28	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	MARTIN TERESA L.	QC	6/9/2025	RB	1724-2282
29	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	WEBB PATRICIA G.	QC	6/9/2025	RB	1724-2277
30	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	HANSON KEYAN	QC	5/29/2025	RB	1724-208
31	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	CARTER RICHARD J. TRUSTEE	QC	5/29/2025	RB	1724-163
32	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	LEINONEN CARRIE A.	QC	5/28/2025	RB	1723-2941
33	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	SHELTON STACY L.	QC	5/28/2025	RB	1723-2917
34	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	AUSTIN KENNETH DARRELL	QC	5/28/2025	RB	1723-2878
35	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	MASON LEDDA HOPE AKA	QC	5/27/2025	RB	1723-2731
36	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	SHELTON STACY L.	QC	5/27/2025	RB	1723-2617
37	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	ZARICOR STEVEN C.	QC	5/27/2025	RB	1723-2613
38	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	MALHOIT ANN S.	QC	5/21/2025	RB	1723-1971
39	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	BELCASTRO DENISE	QC	5/21/2025	RB	1723-1967
40	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	HAGEN DAVID VON	QC	5/21/2025	RB	1723-1850
41	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	BIRCHFIELD SANDRA J.	QC	5/15/2025	RB	1723-839
42	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	BIRCHFIELD SANDRA J.	QC	5/15/2025	RB	1723-833
43	HIAWATHA MANOR WEST ASSOCIATION INCORPORATED [REDACTED]	MCDOWELL GEORGE *	QC	3/28/2025	RB	1719-658

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EXHIBIT N

**2025 Deed Transfers of Timeshare Interests
Naming Lemonjuice Capital, LLC as Grantee**

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Item	Grant[OR] / Grant[EE]	Other Party	Instr. Type	Date	Class	Blk-Pg-File#
1	LEMON JUICE CAPITAL LLC	CASKEY LARRY D.	QC	7/23/2025	RB	1727-2462
2	LEMON JUICE CAPITAL LLC	DUNSTON PERCY F.	QC	7/23/2025	RB	1727-2380
3	LEMON JUICE CAPITAL LLC	COLEY JUDY	QC	7/23/2025	RB	1727-2388
4	LEMON JUICE CAPITAL LLC	SUGGS JEREMY R.	QC	7/23/2025	RB	1727-2394
5	LEMON JUICE CAPITAL LLC	EDWARDS DANNY	QC	6/30/2025	RB	1726-1027
6	LEMON JUICE CAPITAL LLC	MATTHEWS BENNY W.	QC	6/30/2025	RB	1726-866
7	LEMON JUICE CAPITAL LLC	THARP JEFF	QC	6/30/2025	RB	1726-670
8	LEMON JUICE CAPITAL LLC	NICHOLSON SUE	QC	6/30/2025	RB	1726-633
9	LEMON JUICE CAPITAL LLC	SIEGEL JEFFREY A.	QC	6/26/2025	RB	1726-52
10	LEMON JUICE CAPITAL LLC	SIEGEL JEFFREY A.	QC	6/26/2025	RB	1726-48
11	LEMON JUICE CAPITAL LLC	POOK GARRY G.	QC	6/26/2025	RB	1726-28
12	LEMON JUICE CAPITAL LLC	JORGENSEN DEBORAH	QC	6/24/2025	RB	1725-2399
13	LEMON JUICE CAPITAL LLC	BROWN REGINA H.	QC	6/24/2025	RB	1725-2428
14	LEMON JUICE CAPITAL LLC	TABOR GREGORY S.	QC	6/18/2025	RB	1725-1420
15	LEMON JUICE CAPITAL LLC	SIVERD AMY K.	QC	6/13/2025	RB	1725-318
16	LEMON JUICE CAPITAL LLC	HIAWATHA MANOR ASSOCIATION INCORPORATED	QC	3/28/2025	RB	1719-762
17	LEMONJUICE CAPITAL LLC	CASKEY LARRY D.	QC	7/23/2025	RB	1727-2462
18	LEMONJUICE CAPITAL LLC	SUGGS JEREMY R.	QC	7/23/2025	RB	1727-2394
19	LEMONJUICE CAPITAL LLC	DUNSTON PERCY F.	QC	7/23/2025	RB	1727-2380
20	LEMONJUICE CAPITAL LLC	COLEY JUDY	QC	7/23/2025	RB	1727-2388
21	LEMONJUICE CAPITAL LLC	EDWARDS DANNY	QC	6/30/2025	RB	1726-1027
22	LEMONJUICE CAPITAL LLC	MATTHEWS BENNY W.	QC	6/30/2025	RB	1726-866
23	LEMONJUICE CAPITAL LLC	THARP JEFF	QC	6/30/2025	RB	1726-670
24	LEMONJUICE CAPITAL LLC	NICHOLSON SUE	QC	6/30/2025	RB	1726-633
25	LEMONJUICE CAPITAL LLC	SIEGEL JEFFREY A.	QC	6/26/2025	RB	1726-52

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Item	Grant[OR] / Grant[EE]	Other Party	Instr. Type	Date	Class	Bk-Pg-File#
26	LEMONJUICE CAPITAL LLC [REDACTED]	SIEGEL JEFFREY A.	QC	6/26/2025	RB	1726-48
27	LEMONJUICE CAPITAL LLC [REDACTED]	POOK GARRY G.	QC	6/26/2025	RB	1726-28
28	LEMONJUICE CAPITAL LLC [REDACTED]	POOK GARRY G.	QC	6/26/2025	RB	1726-24
29	LEMONJUICE CAPITAL LLC [REDACTED]	BROWN REGINA H.	QC	6/24/2025	RB	1725-2428
30	LEMONJUICE CAPITAL LLC [REDACTED]	JORGENSEN DEBORAH	QC	6/24/2025	RB	1725-2399
31	LEMONJUICE CAPITAL LLC [REDACTED]	TABOR GREGORY S.	QC	6/18/2025	RB	1725-1420
32	LEMONJUICE CAPITAL LLC [REDACTED]	SIVERD AMY K.	QC	6/13/2025	RB	1725-318
33	LEMONJUICE CAPITAL LLC [REDACTED]	TAYLOR HOMER DALLAS	QC	6/9/2025	RB	1724-2290
34	LEMONJUICE CAPITAL LLC * [REDACTED]	HIAWATHA MANOR ASSOCIATION INCORPORATED	QC	3/28/2025	RB	1719-762

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Cumberland County Tennessee

EXHIBIT O

Recorded Deed

**Transfer of 70 Timeshare Intervals From
Hiawatha Manor Association West to Hiawatha Manor Association, Inc.
January 8, 2025**

BK/PG: 1713/1456-1464

25029548

9 PGS : QUITCLAIM DEED

BAILEY DAVIS 208282 - 25029548

01/08/2025 - 01:01 PM

VALUE

MORTGAGE TAX 0.00

TRANSFER TAX 0.00

RECORDING FEE 45.00

DP FEE 2.00

REGISTER'S FEE 2.00

TOTAL AMOUNT 49.00

STATE OF TENNESSEE, CUMBERLAND COUNTY

TREY KERLEY

REGISTER OF DEEDS

Address New Owner:

PO BOX 469

Crossville, TN 38557

Send Tax Bill to:

PO BOX 469

Crossville, TN 38557

QUITCLAIM DEED

HIAWATHA MANOR

This instrument prepared by and after recording return to:

Lemonjuice Solutions

7380 W. Sand Lake Rd. Suite 130

Orlando, Florida 32819

MADE AND ENTERED INTO THIS DAY, January 8, 2025, for and in consideration of the sum of Ten Dollars (\$10.00), cash in hand paid, together with other good and valuable consideration not herein mentioned, receipt of all of which is hereby acknowledged, HIAWATHA MANOR WEST ASSOCIATION, INC., with an address of 8007 Cherokee Tr. Crossville, TN 38572, (hereinafter, the "**Grantor**"), has this day bargained and sold, and by these presents does hereby bargain, sell, transfer, quitclaim, assign and convey unto HIAWATHA MANOR ASSOCIATION, INC., (hereinafter, the "**Grantee**"), its successors and assigns, all of Grantor's interest in the following described real property, lying and being in the THIRD CIVIL DISTRICT of Cumberland County, Tennessee, bounded and described as follows:

Any right, title, and interest in Certain real estate located in Crossville, Cumberland county, Tennessee (Subject Time-Share Estates) being Units and Weeks as designated in Exhibit "A", attached hereto and incorporated herein at:

TANSI RESORT, INC.'S HIAWATHA MANOR WEST, of record and as filed in the Declaration of Horizontal Property Regime, Deed Book 256, page 91, Register's Office, Cumberland County, Tennessee, as amended, including all rights, privileges, easements, and appurtenances thereto, wheresoever situated and howsoever derived.

This is improved property known as 8007 Cherokee Tr. Crossville, TN 38572.

Case 2:25-bk-01916 Doc 63-2 Filed 07/29/25 Entered 07/29/25 15:11:30 Desc

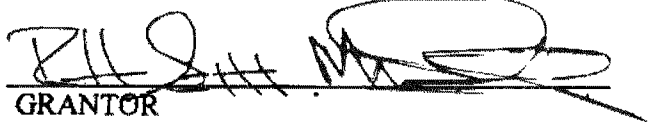
Exhibit Supporting Exhibits Page 50 of 73

Book 1713 Page 1456

THE GRANTOR HEREBY APPOINTS Grantee as its true and lawful "Attorney-in-Fact", granting unto said attorney the full power and authority to do and perform any and all acts deemed by Grantee to be necessary to correct or amend this instrument by "Corrective Deed", or similar instrumentation for the purpose of correcting book, page, spelling and innocuous and immaterial errors, for matters of public record and the vesting of proper title in the Grantee. A reference to the Book and Page of this Deed filing in the applicable land records in a Corrective deed or similar conveyance shall be sufficient to substantiate the applicability and effectiveness of the rights hereby conferred. This Power of Attorney cannot be revoked and shall survive the death, disability and incompetence of Grantor, individually and/or collectively.

This Property is conveyed subject to such limitations, restrictions and encumbrances as may affect the premises. Grantor makes no representations or warranties whatsoever with regard to the Property or the Grantor's interest therein.

IN WITNESS WHEREOF, the said Grantor caused this instrument to be signed and sealed these presents the day and year first above written.


GRANTOR

By: R. Scott MacGregor
Its: Authorized Agent

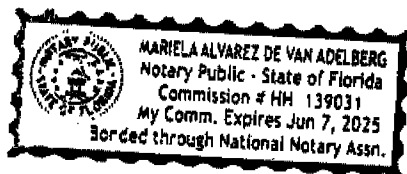
**STATE OF FLORIDA
COUNTY OF ORANGE**

Before me, the undersigned, a Notary Public of the State and County aforesaid, personally appeared R. Scott MacGregor, with whom I am personally acquainted (or proved to me on the basis of satisfactory evidence), and who, upon oath, acknowledged himself to be the Authorized Agent of Hiawatha Manor Association, Inc., the within named bargainor, a Tennessee not-for-profit corporation, and that he as such Authorized Agent being authorized so to do, executed the foregoing instrument for the purposes therein contained, by signing the name of the Hiawatha Manor Association, Inc. by himself as its Authorized Agent.

WITNESS my hand and official seal at Orlando, Florida, this 8th day of January, 2025.


Notary Public

My Commission Expires: Jun 7, 2025



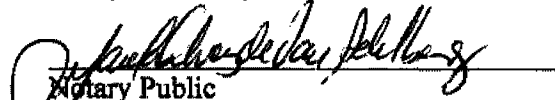
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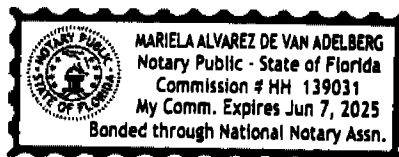
**STATE OF FLORIDA
COUNTY OF ORANGE**

The actual consideration for this transfer is \$0.00.


R. Scott MacGregor, Affiant

Subscribed and sworn to before me this the 8th day of January, 2024.


Notary Public



My Commission Expires: Jun 7, 2025

EXHIBIT "A"

Blocks, units, weeks and derivations are as follows:

Block	Unit	Week	Grantor	Book	Page	Date of registration	Parcel
2	A	5	J. Warren Layne and Marion E. Layne	D456	373	9/21/1993	149D-A-2.00
3	B	5	Crown Resorts Development, Llc.	1576	538	5/13/2020	149D-A-2.00
1	B	2	Crown Resorts Development, Llc.	1576	538	5/13/2020	149D-A-2.00
2	C	3	Crown Resorts Development, Llc	1576	538	5/13/2020	149D-A-2.00
19	B	5	Crown Resorts Development, Llc.	1576	538	5/13/2020	149D-A-1.00
20	D	5	Crown Resorts Development, Llc.	1576	538	5/13/2020	149D-A-1.00
19	A	48	Crown Resorts Development, Llc.	1576	538	5/13/2020	149D-A-1.00
7	F	6	Crown Resorts Development, Llc.	1576	538	5/13/2020	149D-A-3.00
9	C	1	Crown Resorts Development Llc	1587	1155	9/21/2020	149D-A-3.00
9	D	1	Crown Resorts Development Llc	1587	1155	9/21/2020	149D-A-3.00
18	B	6	Hazel R. Dowdy, Sole Survivor of Joint Tenancy With William T. Dowdy	1593	69	11/16/2020	149D-A-3.00
3	D	5	RANDALL LEE DAVIDSON, Executor of The Estate of ALETA N. DAVIDSON who was sole survivor of joint tenancy with J. C. DAVIDSON	1606	1967	4/8/2021	149D-A-2.00
9	B	10	Hughes Electric Kentucky, Inc., Katherine C. Hughes, President	1606	1969	4/8/2021	149D-A-3.00
6	B	22	BERCHIE MARIE ROBERTS, Executrix of The Estate Of WAYNE O. ROBERTS	1611	364	5/24/2021	150-25.00
24	B	8	Paul V. Wells	1616	1193	7/19/2021	149D-H-1.00

Block	Unit	Week	Grantor	Book	Page	Date of registration	Parcel
3	C	21	Robert E. Hargrave And Sylvia Hargrave	1621	1179	9/7/2021	149D-A-2.00
7	A	2	Carl E. Richardson, Jr. And Etta R. Richardson	1621	1175	9/7/2021	149D-A-3.00
8	C	13	CATHERINE ABERNATHY, Sole Survivor of Joint Tenancy With MICHAEL D. ABERNATHY	1624	218	10/1/2021	149D-A-3.00
18	D	1	Dallas W. Johnson and Peggie A. Johnson	1624	216	10/1/2021	149D-A-1.00
8	D	14	JAMES DOUGLAS HAGAR, Only Living Heir Of MARY I. HAGAR	1624	212	10/1/2021	149D-A-3.00
6	C	49	Stuart W. Fletcher and Kimberly K. Fletcher	1624	206	10/1/2021	149D-A-3.00
4	A	52	Craig Alan Stephenson and Brittany Blankenship Stephenson fka Brittany Leanne Blankenship	1625	2237	10/21/2021	149D-A-2.00
2	B	52	Daniel L. Hammond and Wanda G. Hammond	1626	2444	11/1/2021	149D-A-2.00
21	A	25	Arvil Stearman and Opal Stearman	1629	1277	11/29/2021	149D-A-1.00
18	C	50	Teresa Reed	1632	760	12/28/2021	149D-A-1.00
19	C	36	Roger D. Dotson and Lisa M. Dotson	1633	682	1/10/2022	149D-A-1.00
8	E	27	Elaine M. Standridge, Sole Survivor of joint tenancy with Earl Standridge	1637	2130	3/4/2022	149D-A-3.00
18	A	8	Donavin Gillespie and Alyne Gillespie	1656	305	9/26/2022	149D-A-1.00
20	B	37	Marian T. White, sole survivor of joint tenancy with Billy M. White	1657	987	10/11/2022	149D-A-1.00
9	A	50	Todd R. Cognion and Darby A. Cognion and Chad J. Gingrich, Sole Survivors Of Joint Tenancy With Larry C.	1657	989	10/11/2022	149D-A-3.00

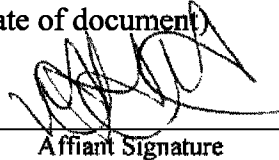
Block	Unit	Week	Grantor	Book	Page	Date of registration	Parcel
			Gingrich and Shirley J. Gingrich				
8	B	46	Todd R. Cognion and Darby A. Cognion and Chad J. Gingrich, sole Survivors of joint tenancy with Larry C. Gingrich and Shirley J. Gingrich	1657	989	10/11/2022	149D-A-3.00
21	C	19	Jon D. Epperson and Shirley F. Epperson	1658	808	10/24/2022	149D-A-1.00
8	A	15	Walter L. Crox and Barbara H. Crox	1658	1804	10/31/2022	149D-A-3.00
22	D	39	Patricia A. Reeves, sole survivor of joint tenancy with Richard D. Reeves	1659	682	11/8/2022	149D-H-1.00
21	B	32	Jimmy Denham and Teresa Denham	1660	430	11/22/2022	150-25.00
7	C	20	Mark Beaty and Connie Beaty	1661	994	12/12/2022	149D-A-3.00
7	B	44	Bettie L. Miller, sole survivor of joint tenancy with James L. Miller, Jr.	1663	1835	1/25/2023	149D-A-3.00
25	A	2	Phyllis L. Hart	1664	38	1/31/2023	149D-H-1.00
21	D	45	Mike Russell and Susan Russell	1664	2064	2/13/2023	149D-A-1.00
24	D	41	Sam B. Mckinney, Jr. and Key E. Mckinney	1665	935	2/21/2023	149D-H-1.00
23	A	26	Robert F. Kohler, Sole Survivor Of Joint Tenancy With Judith B. Kohler	1665	931	2/21/2023	149D-H-1.00
24	C	6	Johnathan R. Carter and Barbara Carter	1665	951	2/21/2023	149D-H-1.00
25	B	4	Sammy Popwell and Linda J. Popwell	1665	1384	2/23/2023	149D-H-1.00
26	A	21	Larry Brackner and Sharon Brackner	1665	1380	2/23/2023	149D-H-1.00
8	F	31	James T. Bandy and Peggy J. Bandy	1665	1398	2/23/2023	149D-A-3.00

Block	Unit	Week	Grantor	Book	Page	Date of registration	Parcel
23	B	3	Judith E. Poland aka Judith E. Polland Trochelman	1666	818	3/6/2023	149D-H-1.00
22	A	8	Dana N. Hassler and Kassandra Hassler	1666	822	3/6/2023	149D-H-1.00
20	A	41	Richard N. Mercader and Charlotte D. Mercader	1668	365	3/30/2023	149D-A-1.00
24	A	22	Benjamin Alig and Debra L. Alig	1668	353	3/30/2023	149D-H-1.00
3	A	23	Van M. Jodon and Phyllis J. Jodon and Christopher S. Jodon and Angelinque N. Aviles	1668	347	3/30/2023	149D-A-2.00
22	B	42	Kent B. West, sole survivor of joint tenancy with Cheryl E. West	1669	748	4/17/2023	149D-A-1.00
9	E	32	Anthony H. Ritter and Mary Jane Ritter	1671	930	5/15/2023	149D-A-3.00
23	D	12	Horace Bill Brent, Jr. and Ruth Lee Brent	1671	964	5/15/2023	149D-H-1.00
26	B	24	Robert E. Moffett and Kimberly R. Moffett	1672	762	5/25/2023	149D-H-1.00
1	D	24	Eric A. D. Bell and Barbara T. Bell	1673	513	6/6/2023	149D-A-2.00
6	D	14	William Reading and Donna Reading and Brian Jackson and Shirley Jackson	1673	1729	6/12/2023	149D-A-3.00
22	C	15	Delia N. Belcher, Sole Survivor Of Joint Tenancy With George T. Belcher	1673	1723	6/12/2023	149D-H-1.00
4	B	26	Glen R. Castleberry and Judith H. Castleberry	1678	1668	8/17/2023	149D-A-2.00
4	D	31	Wesley Hardman	1680	1892	9/15/2023	149D-A-2.00
7	E	8	BEATRICE GENTRY, Sole Survivor of joint tenancy with Lamour Gentry	1680	1888	9/15/2023	149D-A-3.00
1	A	39	Homer W. Effler and Geneva L. Effler	1683	167	10/20/2023	149D-A-2.00
5	B	29	Roy E. Ferrell and Linda A. Ferrell	1683	161	10/20/2023	149D-A-3.00

Block	Unit	Week	Grantor	Book	Page	Date of registration	Parcel
4	C	41	RALPH DAVID NORRIS, Sole Survivor Of Joint Tenancy With MARGARET DRAKE NORRIS	1684	1011	11/9/2023	149D-A-2.00
23	C	19	Richard S. Ball and Glendia L. Ball	1687	703	12/22/2023	149D-H-1.00
19	D	38	Reece Alan King, Trustee Of The Ricky and Carolin King Irrevocable Trust Dated 11/21/16	1692	1647	3/25/2024	149D-A-1.00
6	A	39	Wendell Drakeford and Vickie Drakeford	1692	1660	3/25/2024	149D-A-3.00
2	D	21	Timothy J. Wolfram and Shirley M. Wolfram	1693	2339	4/15/2024	149D-A-2.00
7	D	13	Linda H. Mccoy and Susan M. Olinger fka Susan M. Mccoy and James Darren Mccoy	1694	2171	4/29/2024	149D-A-3.00
5	D	14	Sarah Sharp	1696	630	5/20/2024	149D-A-3.00
20	C	11	William D. Gocella and Donna K. Gocella	1697	574	6/3/2024	149D-A-1.00
1	C	21	David M. Dixon and Patricia J. Dixon	1699	1225	7/2/2024	149D-A-2.00

Tennessee Certification of Electronic Document

I, Natalie Montes, do hereby make oath that I am a licensed attorney and/or the custodian of the original version of the electronic document tendered for registration herewith and that this electronic document is a true and exact copy of the original document executed and authenticated according to law on Jan 8, 2025 (date of document)

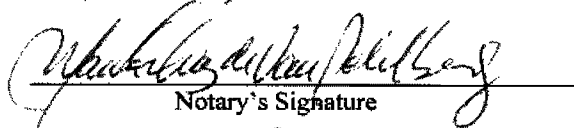

Affiant Signature

01/08/2025
Date

State of Florida

County of Orange

Sworn to and subscribed before me this 8 day of January, 2025.


Notary's Signature

MY COMMISSION EXPIRES: Jun 7, 2025

NOTARY'S SEAL

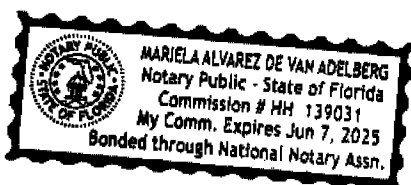


EXHIBIT P

Lemonjuice FAQ To Hiawatha West Owners

May 5, 2025



Thank you for your commitment and dedication to the positive changes at Hiawatha Manor West Resort (Hiawatha Manor Resort). Let's stay engaged!

We encourage you to read all the Frequently Asked Questions to facilitate a successful communication exchange. Should the below does not address your question, please feel free to email us at hiawathawestreimagined@lemonjuice.biz or <https://hiawatharesortwest.info> for regular updates.

The Front Desk team will manage reservation and exchange-related questions, while any questions related to restructuring must be sent via the email address provided in the document. If a phone call is more convenient, please leave a valid phone number, and a member of the Owner Support team will return your call when time permits.

Frequently Asked Questions

Budget Questions

Q: Why are my maintenance fees increasing?

A: Maintenance fees are increasing by 4%, which aligns with the Consumer Price Index (CPI). This increase is modest and is permitted under the governing documents without a full owner vote. It helps address rising operational costs while maintaining essential services.

Q: How much will I owe in total?

A: You will be responsible for 2025–2026 Maintenance Fee: \$624 per interval.

Q: What happens if I pre-paid Maintenance Fees last year?

A: Please contact HiawathaWestReimagination@lemonjuice.biz to provide proof of payment and to pay the \$24 balance.

Q: Will the maintenance fee be used for improvements?

A: The maintenance fee covers operational expenses such as staffing, insurance, utilities, and routine upkeep.

Q: If the resort is sold, will I receive a share of the proceeds?

A: If you are an owner in good standing (i.e., all fees are paid and you have not deeded back your interval), you may be eligible for a share of any net proceeds from a potential sale, based on your ownership interest and applicable terms.

Q: When will the vote to amend and remove the units happen?

A: We are preparing the legal documents and logistics for the vote. You will receive advance notice, a full explanation of the process, and voting instructions in the coming weeks.

Q: Which of the units have been identified to be sold?

A: All units in buildings 1, 18, 19, 20, 21, 22, 23, 24, 25, and 26 located on Cochise Trail and White Wolf intersection.

May 5, 2025

Q: Who can I contact with questions or for assistance?

A: Please reach out to our Owner Support Team at:

HiawathaWestReimagined@lemonjuice.biz

We're here to help and are committed to keeping all owners informed and supported throughout this process.

Bankruptcy Questions

Q: Why are we taking this route?

A: The purpose of this bankruptcy is to obtain a federal court order to oversee the sale proceeding and also ensure that everything is carried out adequately regarding the sale of Hiawatha West up to and including distribution of the net proceeds of any sale amount to the current owners.

Q: How will the bankruptcy process affect me as an owner?

A: Bankruptcy is an association-level process aimed at selling the Hiawatha West property to maximize its value for all owners. It will not affect your personal credit.

Q: How long is this process going to take?

A: The entire process can take up to 1 year. The auction will occur after the Court approves the sale of Hiawatha East.

Q: Will I need to appear in Court?

A: You will not be required to appear before the Court. If the Judge approves the sale, you will receive your due share of the sale proceeds at the time of distribution.

Q: What if I am behind on my fees?

A: Any delinquent fees and related expenses owed to Hiawatha West will be deducted from your proceeds after the sale. The remaining funds will be distributed to the owners after all accounts have been settled.

General Questions

Q: Why did Hiawatha Manor West Resort close temporarily?

A: Hiawatha West was temporarily closed due to the unexpected layoff of essential resort employees. These layoffs were made without prior notification to Hiawatha Manor Association Inc. or Lemonjuice Solutions, leaving the resort unable to maintain the staffing levels necessary for operation.

Q: How will I be informed about updates?

A: Updates will be posted on the Frequently Asked Questions page at <https://hiawatharesortwest.info>. Additionally, owners can email hiawathawestreimagined@lemonjuice.biz for more information.

Q: Will there be any impact on my ownership or reservations?

A: The team is working to ensure all guests and owners are informed and any questions regarding ownership or reservations will be addressed directly. Please contact us if you have specific concerns.

May 5, 2025

Q: What is Lemonjuice Solutions?

A: Lemonjuice Solutions (LJS) provides strategic planning, restructuring execution, investment capital, and professional management to legacy timeshare properties. The company has extensive experience in the timeshare industry. One of our specialties is assisting distressed timeshare properties and proposing options to resolve financial issues, a process done through its Resorts Reimagined™ program.

Q: Is Lemonjuice Solutions affiliated with Hiawatha Manor West Resort?

A: Lemonjuice Solutions has been chosen by the Board as the new management company for Hiawatha Manor West Resort. It's important to note that Lemonjuice Solutions is independent and not affiliated with any of the Board Members or Developers associated with Hiawatha Manor West Resort.

Q: Why would the Board contemplate filing bankruptcy?

A: The nature of timeshare, with multiple co-owners within each condominium dedicated to a timeshare usage plan, generally exceeds any state court's ability to resolve partition related questions. Hiawatha Manor West Resort is further complicated by the buildings that were removed decades ago that still are believed to have rights associated with non-existing intervals. Some of those deeds are still held by individuals.

Q: What will happen to future reservations?

A: This transaction is not expected to affect 2025 reservations. If you currently have reservations deposited with the exchange company, they will remain in full force and effect, as will any other benefits you have of record in your existing ownership. Hiawatha Manor is committed to ensuring that all owners continue to have the quality vacation experience that all owners deserve.

Q: What are the plans for the property?

A: The goal is to provide a course of action that will protect all owners and provide value for their timeshare ownership.

Q: Why is this happening to Hiawatha Manor West?

A: As shown in the letter, Hiawatha Manor is currently facing financial hardship. Furthermore, after years of diminishing ownership and deferred maintenance, Hiawatha is unable to collect sufficient maintenance fees to sustain its operations. Increasing maintenance fees would likely lead to more owners discontinuing payments. This is the principal reason the Board enlisted the services of Lemonjuice Solutions.

Q: Who should I contact with other questions?

A: For Reimagination and Owner Support related questions, please call the resort at 931-444-1394. If email is a preferred option, please email at hiawathawestreimagined@lemonjuice.biz. You may also review <https://hiawatharesortwest.info> for regular updates.

Q: Where do I mail correspondence?

A: Hiawatha Manor Resort West

Hiawatha Manor West

May 5, 2025

c/o: Lemonjuice Solution Reimagination

7380 W. Sand Lake Rd., Suite 130,

Orlando, Florida 32819

EXHIBIT Q

**Letter from Hiawatha Manor Association Board
Announcing 2024 Annual Members' Meeting
Undated**

Dear Hiawatha Manor Owner:

Good news! No increase in maintenance fees for fiscal year 2024/2025.

The Hiawatha Manor Association annual meeting will be held at 10:00 a.m., Saturday, March 16, 2024, at the Hiawatha Community Center, 125 Country Club Drive, Crossville, TN 38572. Registration will begin at 9:30 a.m. We look forward to seeing everyone again this year.

As most of you know, since the onset of the pandemic, the association has experienced a significant decline in owners who have paid the maintenance fees and assessments needed to maintain and repair the resort's aging buildings. As the number of delinquent owners has increased, so, too, has the burden on the remaining active owners to fund a quality vacation experience at Hiawatha Manor.

In addition to declining dues income, the board and employees have wrestled with the challenges of rising costs, leaving the association without the cash flow needed to operate as a timeshare resort in the long term. We've considered all feasible options — contacting industry experts, leaders at other failing resorts, and potential investors — and we've concluded that it will be in the best interest of our owners to develop a strategy to discontinue the timeshare's operations and find a potential buyer for the property.

The board intends to implement their strategy to stabilize the association's fiscal position and continue operating, so our owners can enjoy their timeshare this upcoming fiscal year as we further implement our strategy to discontinue the timeshare operations. We have kept the maintenance fee the same as in the prior year, and our employees will continue to do all they can to reduce costs. We ask for your support in making prompt payments, as it is critical for our staff to properly budget for expenses throughout the year.

As before, you can vacation at Tansi, or exchange through RCI or Interval International. If you are looking for a low-cost alternative, our management company, Vacatia, offers the opportunity to trade your week for stays at other Vacatia-managed properties throughout the country, with the OwnerPLUS benefit. You can enjoy a weeklong vacation or multiple short stays in popular destinations such as New Orleans, Virginia Beach, Daytona, the Tampa area, Scottsdale, and Breckenridge. For more information, call Customer Care at 833-643-0693.

Obviously, our ability to maintain the quality of the property through the coming year depends on owners paying their maintenance fee. We hope you can attend the annual meeting and share your thoughts and questions with fellow owners. We will also share our complete strategy to responsibly discontinue timeshare operations.

Please sign and return the enclosed proxy to approve the budget as soon as possible. The proxy enables you to vote for all significant issues yourself, assign your vote to someone of your choice, or assign your vote to the president of the association (who is also an owner). You have one vote for each week owned, so be sure to list all weeks associated with this account.

Lastly, we want to thank you for allowing us the opportunity to serve the association for so many years. As we prepare to discontinue the operations of Hiawatha Manor, we are committed to providing a workable strategy and a graceful exit for our owners.

With Deepest Gratitude,

Hiawatha Manor Association Board of Directors

**Hiawatha East
FY24-25 Budget**

	<u>FY24-25 Budget</u>	<u>FY23-24 Budget</u>	<u>\$ Variance</u>	<u>% Variance</u>
Revenues				
Maintenance Dues and Other Income	\$ 625,625	\$ 679,905	\$ (54,280)	-8%
Reserve Assessment	-	71,308	(71,308)	-100%
Rental and Other Income	86,134	130,451	(44,317)	-34%
Total Revenues	<u>711,759</u>	<u>881,665</u>	<u>(169,905)</u>	
Expenses				
Utilities and Other Services	131,042	139,911	(8,869)	-6%
Property Repairs and Maintenance	64,793	124,428	(59,635)	-48%
Unit Expense	35,891	22,995	12,896	56%
Automobile Expense	3,569	11,218	(7,649)	-68%
Payroll	198,892	211,008	(12,115)	-6%
General and Administrative	35,474	28,960	6,514	22%
Recreation	6,969	12,000	(5,031)	-42%
Insurance	93,027	48,090	44,937	93%
Taxes	21,992	20,621	1,371	7%
Property Management Fees	40,950	64,156	(23,206)	-36%
Accounting Fees	24,189	23,484	705	3%
Dues Servicing Expense	19,321	18,438	883	5%
P.O.A. Fees	24,385	23,675	710	3%
Depreciation Expense	10,564	10,952	(389)	-4%
Allowance for Bad Debt	-	71,285	(71,285)	-100%
Total Expenses	<u>711,057</u>	<u>831,221</u>	<u>(120,164)</u>	<u>-14%</u>
Reserve Assessment	-	71,308	(71,308)	
Net Income/(Loss)	<u>\$ 703</u>	<u>\$ (20,864)</u>	<u>\$ 21,566</u>	

	FY24-25 Dues			
	<u>1BD</u>	<u>2BD/1BR</u>	<u>2BD/2BR</u>	<u>3BD</u>
Maintenance Dues	\$ 524.00	\$ 699.00	\$ 759.00	\$ 849.00

EXHIBIT R

**Excerpt from Zoom Meeting Recording
Discussion Regarding Lemonjuice's Selection
February 24, 2025**

The following exchange occurred during the February 24, 2025 Zoom meeting:

(33:49) MS. SIMMONS: Okay. Was there not a member meeting at the very start of the process where Lemonjuice was introduced? Was there not a Zoom meeting?

I have not received any notices whatsoever until very recently. So I'm totally in the dark except for what I've been able to see on the info dot site.

And I'm wondering if there was an introduction zoom meeting. And if that could be posted.

MS. KOEPPEN: If it's not posted on the web site, then we don't have a recording.

So everything that we have recordings of are posted on the dot info site.

Now, when we took over, there was some transition there where we were introduced but we weren't management. And so until we were management company, we weren't able to do things like record the meetings or facilitate certain things.

So if we were brought in as a guest of Vacatia, we do not have those recordings.

MS. SIMMONS: Can I ask if the Board members have those recordings? And also if Lemonjuice could request them from Vacatia?

MS. KOEPPEN: We've made a lot of requests from Vacatia.

MS. SIMMONS: Yes, I understand that. I understand that from watching the --

(34:59) MS. KOEPPEN: So we are willing to share everything we have. Nobody is trying to hide anything but -- or omit anything. But there are some things that we just do not have access to.

MS. SIMMONS: The Board -- I want to ask the Board -- they don't have a copy of that Zoom meeting? They don't have a recording?

MR. DOBY: No, we don't.

Dr. BOB: We do not have a recording.

MS. SIMMONS: Okay. And there was also --

DR. BOB: If you are that interested, I would recommend you join the Board.

MS. SIMMONS: Well, it's too late to get that recording.

DR. BOB: Never too late. Never too late.

MS. SIMMONS: But if it's not available, it's too late to get that recording?

MR. DOBY: I don't believe there's a recording available. When we started, Vacatia was still our management company.

(35:50) DR. BOB: We were still deciding. We let the – basically the people to decide whether they wanted to go with Lemonjuice – or a recommendation. So we just followed the recommendation of the people.

MS. SIMMONS: But there's no recording of that?

DR. BOB: We're trying to do the best for you – to get the best outcome, so –

EXHIBIT S

Excerpt from Zoom Meeting Recording of February 24, 2025

Discussion of February 14, 2025 Purchase and Assignment Agreement

*Lemonjuice Representative Statement that Agreement is Confidential and Not Available for
Member Review*

The following exchange occurred during the February 24, 2025 Zoom meeting:

(31:37) MS. SIMMONS: Okay. And was this purchase agreement part of the original agreement with Lemonjuice, or was this executed at a later time?

MS. KOEPPEN: It was executed at a later time.

MS. SIMMONS: And I don't see the recording where that was presented to the Board. I wonder if you could post that on the info dot site? And also post the agreement?

MS. KOEPPEN: The – we cannot post the agreement. The agreement's confidential. It's between the Board and Lemonjuice. Um and the Association and Lemonjuice. But the agreement was presented in August and it was approved in a Board meeting in August.

So I think we have that recording. I'll find it for you.

MS. SIMMONS: Actually, in that meeting it was discussed that you would be presenting the contract, but it was not presented at that meeting.

MS. KOEPPEN: I can follow up on that.

The Board has a copy of the agreement and has reviewed it, but we can't post it.

And part of it is because it includes confidential things such as payroll and other issues. Because that's part of what those funds are covering.

EXHIBIT T

**Declaration of Linda Simmons
in Support of Transcript Accuracy and Exhibit Authentication**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

In re:

Chapter 11

Hiawatha Manor Association, Inc.,

Case No. 25-01916

Debtor.

Judge Randal S. Mashburn

**DECLARATION OF LINDA SIMMONS
IN SUPPORT TRANSCRIPT ACCURACY AND EXHIBIT AUTHENTICATION**

I, Linda Simmons, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a fully paid co-owner of timeshare interests at Hiawatha Manor Association East and a party in interest in the above-captioned Chapter 11 case.
2. I have personally reviewed and transcribed portions of publicly available Zoom meetings conducted by representatives of the Debtor and its management company, Lemonjuice Solutions, LLC, during 2024 and 2025.
3. I am familiar with the contents of Exhibits G, H, J, R, and S to the Motion of Linda Simmons for Rule 2004 Production of Documents. The transcript excerpts and quotes contained in those exhibits are accurate to the best of my ability and are true representations of the statements made during those meetings.
4. I accessed the Zoom recordings posted at hiawatharesort.info, preserved copies of them, and used those recordings to prepare the transcript excerpts and quotations referenced in the exhibits.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 29, 2025.

/s/ Linda Simmons

Linda Simmons, Pro Se

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